

Appointment

From: Samulski, Michael [samulski.michael@epa.gov]
Sent: 5/30/2017 2:48:07 PM
To: Samulski, Michael [samulski.michael@epa.gov]; Lundy, Wayne M CIV [Wayne.M.Lundy@uscg.mil]; Mike Rand (michael.p.rand@uscg.mil) [michael.p.rand@uscg.mil]; Edwards, Matt CAPT [Matt.Edwards@uscg.mil]; Murad, Dale [Dale.Murad@uscg.mil]; Revelt, Jean-Marie [revelt.jean-marie@epa.gov]; Aranda, Amber [aranda.amber@epa.gov]; Stout, Alan [stout.alan@epa.gov]; Mueller, John [mueller.john@epa.gov]
Subject: Discussion of 2 steamship exemption requests
Attachments: Ex. 4 CBI
Location: Call-in Ex. 6 - Personal Privacy
Start: 5/31/2017 5:00:00 PM
End: 5/31/2017 6:00:00 PM
Show Time As: Busy

Over the past week or so, we've had two Jones Act companies approach us asking for an extension in the steamship exemption for ECA fuel sulfur standards. As a reminder, the ECA fuel sulfur standards do not apply to steamships until 1/1/2020.

Ex. 4 CBI

The other request is from US Shipping, who may have also reached out to Wayne. I copied a summary below of my call with them.

Is there a time, either today or sometime next week (I'm out of the office tomorrow), when you would be available for a call to discuss these requests?

Thanks,

Mike

Michael Samulski
 U.S. Environmental Protection Agency
 Office of Transportation and Air Quality
 Director, Large Marine and Aircraft Center
 1 (734) 214-4532
samulski.michael@epa.gov

I received a call from US Shipping Corp last Friday. This was the company that reached out to Kathy Metcalf (Chamber of Shipping of America) asking for an appropriate EPA contact.

US Shipping operates 6 Jones Act vessels in the Gulf and along the East Coast. They have 2 ships and 4 ATBs. One of the ships is a steamship named CHEMICAL PIONEER.

Ex. 4 CBI

Ex. 4 CBI

Their specific request is an extension of the steamship exemption until sometime in 2021.

Ex. 4 CBI

Ex. 4 CBI

Contact details are below for the two people I spoke with:

Andy Hoeflin
Manager, Engineering
Office: (732) 635-2719
Cell: (732) 259-0943
Email: ahoefflin@usshipcorp.com

Raymond Marquardt
Director, Safety Compliance
USS Vessel Management LLC
Tel: (732) 635-2708
Cell: (732) 259-0928
e-mail: rmarquardt@usshipcorp.com

Message

From: Samulski, Michael [samulski.michael@epa.gov]
Sent: 8/1/2017 2:37:36 PM
To: Rand, Michael P CIV [Michael.P.Rand@uscg.mil]; Lundy, Wayne M CIV [Wayne.M.Lundy@uscg.mil]; Murad, Dale [Dale.Murad@uscg.mil]
CC: Revelt, Jean-Marie [revelt.jean-marie@epa.gov]; Aranda, Amber [aranda.amber@epa.gov]
Subject: RE: Two steamship exemption requests - time to talk?

US Shipping had a similar request, **Ex. 4 CBI** for the CHEMICAL PIONEER (see all the way down on this email chain).

They spoke with me in May and I believe with Wayne as well. I don't think we ever got anything in writing from them. (Wayne, have you heard back from US Shipping?)

Mike

Michael Samulski
 U.S. Environmental Protection Agency
 Office of Transportation and Air Quality
 Director, Large Marine and Aircraft Center
 1 (734) 214-4532
 samulski.michael@epa.gov

-----Original Message-----

From: Rand, Michael P CIV [mailto:Michael.P.Rand@uscg.mil]
 Sent: Tuesday, August 01, 2017 9:48 AM
 To: Samulski, Michael <samulski.michael@epa.gov>; Lundy, Wayne M CIV <Wayne.M.Lundy@uscg.mil>; Murad, Dale <Dale.Murad@uscg.mil>
 Cc: Revelt, Jean-Marie <revelt.jean-marie@epa.gov>; Aranda, Amber <aranda.amber@epa.gov>
 Subject: RE: Two steamship exemption requests - time to talk?

Mike:

Ex. 4 CBI

I did not prepare a similar letter to US Shipping.

Who is US Shipping,

Ex. 4 CBI

/Mike

-----Original Message-----

From: Samulski, Michael [mailto:samulski.michael@epa.gov]
 Sent: Tuesday, August 01, 2017 9:20 AM
 To: Lundy, Wayne M CIV; Rand, Michael P CIV; Murad, Dale
 Cc: Revelt, Jean-Marie; Aranda, Amber
 Subject: [Non-DoD Source] RE: Two steamship exemption requests - time to talk?

Gentlemen,

Ex. 4 CBI

was there a similar response to US Shipping?

Thanks,

Mike

Michael Samulski
 U.S. Environmental Protection Agency
 Office of Transportation and Air Quality Director, Large Marine and Aircraft Center
 1 (734) 214-4532
 samulski.michael@epa.gov

-----Original Message-----

From: Samulski, Michael
 Sent: Friday, June 30, 2017 8:38 AM

To: 'Lundy, Wayne M CIV' <Wayne.M.Lundy@uscg.mil>; Rand, Michael P CIV <Michael.P.Rand@uscg.mil>; Murad, Dale <Dale.Murad@uscg.mil>
Cc: revelt.jean-marie@epa.gov; aranda.amber@epa.gov
Subject: RE: Two steamship exemption requests - time to talk?

As promised, here are some suggested edits from EPA.

Mike

Michael Samulski
U.S. Environmental Protection Agency
Office of Transportation and Air Quality Director, Large Marine and Aircraft Center
1 (734) 214-4532
samulski.michael@epa.gov

-----Original Message-----

From: Lundy, Wayne M CIV [mailto:Wayne.M.Lundy@uscg.mil]
Sent: Wednesday, June 28, 2017 2:23 PM
To: Rand, Michael P CIV <Michael.P.Rand@uscg.mil>; Murad, Dale <Dale.Murad@uscg.mil>
Cc: Samulski, Michael <samulski.michael@epa.gov>
Subject: RE: Two steamship exemption requests - time to talk?

Thanks guys.

The ltr looks good.

Wayne

-----Original Message-----

From: Rand, Michael P CIV
Sent: Wednesday, June 28, 2017 1:58 PM
To: Murad, Dale; Lundy, Wayne M CIV
Cc: Samulski, Michael
Subject: RE: Two steamship exemption requests - time to talk?

Dale:

I have made a few edits based on your comments. See attached.

r/Mike

-----Original Message-----

From: Murad, Dale
Sent: Wednesday, June 28, 2017 1:03 PM
To: Lundy, Wayne M CIV; Rand, Michael P CIV
Cc: Samulski, Michael
Subject: FW: Two steamship exemption requests - time to talk?

Ex. 5 Deliberative Process (DP)

-----Original Message-----

From: Lundy, Wayne M CIV
Sent: Wednesday, June 28, 2017 11:46 AM
To: Murad, Dale
Cc: Samulski, Michael; Rand, Michael P CIV
Subject: FW: Two steamship exemption requests - time to talk?

Ex. 5 Deliberative Process (DP)

-----Original Message-----

From: Rand, Michael P CIV
Sent: Wednesday, June 28, 2017 7:04 AM
To: Murad, Dale; Lundy, Wayne M CIV
Cc: Samulski, Michael
Subject: RE: Two steamship exemption requests - time to talk?

Dale:

Thank you. The letter conveys the message. I edited the letter head and made two other changes (spelled out abbreviations).

Please review and advise.

r/Mike

-----Original Message-----

From: Murad, Dale
Sent: Tuesday, June 27, 2017 3:47 PM
To: Lundy, Wayne M CIV; Rand, Michael P CIV
Subject: RE: Two steamship exemption requests - time to talk?

Wayne, Mike--Attached is a draft response. I'm not sure if I have the right letterhead, or if I have Capt Edwards signature block correct. Dale

-----Original Message-----

From: Lundy, Wayne M CIV
Sent: Tuesday, June 27, 2017 7:56 AM
To: Samulski, Michael; Rand, Michael P CIV
Cc: Edwards, Matt CAPT; Murad, Dale; Revelt, Jean-Marie; Mueller, John; Stout, Alan; Aranda, Amber
Subject: RE: Two steamship exemption requests - time to talk?

Hi everyone,

I checked w/ Jeff & wanted to get back with you all regarding this issue.

Ex. 5 Deliberative Process (DP)

v/r,
Wayne

-----Original Message-----

From: Samulski, Michael [mailto:samulski.michael@epa.gov]
Sent: Tuesday, May 30, 2017 10:17 AM
To: Rand, Michael P CIV
Cc: Edwards, Matt CAPT; Murad, Dale; Lundy, Wayne M CIV; Revelt, Jean-Marie; Mueller, John; Stout, Alan; Aranda, Amber
Subject: [Non-DoD Source] RE: Two steamship exemption requests - time to talk?

Would tomorrow (Wed 5/31) from 1:00 to 2:00 work for USCG?

Thanks,

Mike

Michael Samulski
U.S. Environmental Protection Agency
Office of Transportation and Air Quality Director, Large Marine and Aircraft Center
1 (734) 214-4532
samulski.michael@epa.gov

-----Original Message-----

From: Rand, Michael P CIV [mailto:Michael.P.Rand@uscg.mil]
Sent: Tuesday, May 30, 2017 9:42 AM
To: Samulski, Michael <samulski.michael@epa.gov>
Cc: Edwards, Matt CAPT <Matt.Edwards@uscg.mil>; Murad, Dale <Dale.Murad@uscg.mil>; Lundy, Wayne M CIV <Wayne.M.Lundy@uscg.mil>
Subject: RE: Two steamship exemption requests - time to talk?

Mike:

I apologize for the delay in responding. I was on leave most of last week.

I am available most of this week to discuss this. I have a meeting tomorrow morning from 9 - 11, and one Thursday from 1:00 until 2:30, but those are the only times I will be unavailable.

Pick a time that is good for you and let me know.

Ex. 4 CBI

r/Mike

-----Original Message-----

From: Edwards, Matt CAPT
Sent: Thursday, May 25, 2017 9:06 AM
To: Murad, Dale; Lundy, Wayne M CIV; Rand, Michael P CIV
Cc: Samulski, Michael
Subject: RE: Two steamship exemption requests - time to talk?

I believe Mike Rand is out the remainder of the week. I would prefer to wait until he returns if we can.

CAPT Matt Edwards, P.E.
U.S. Coast Guard Headquarters
Office of Commercial Vessel Compliance
(202) 372-1210

-----Original Message-----

From: Murad, Dale
Sent: Thursday, May 25, 2017 8:43 AM
To: Lundy, Wayne M CIV; Rand, Michael P CIV; Edwards, Matt CAPT
Cc: Samulski, Michael
Subject: RE: Two steamship exemption requests - time to talk?

Wayne, Mike, Capt Edwards--I'm in today. As of now I'm in all next week, but that may change. (If you do it next week and I'm not in, I'll either call in or have someone cover for me.) Dale

-----Original Message-----

From: Samulski, Michael [mailto:samulski.michael@epa.gov]
Sent: Thursday, May 25, 2017 8:01 AM
To: Lundy, Wayne M CIV; Rand, Michael P CIV; Edwards, Matt CAPT; Murad, Dale
Cc: Revelt, Jean-Marie; Aranda, Amber; Stout, Alan; Mueller, John
Subject: [Non-DoD Source] Two steamship exemption requests - time to talk?

Over the past week or so, we've had two Jones Act companies approach us asking for an extension in the steamship exemption for ECA fuel sulfur standards. As a reminder, the ECA fuel sulfur standards do not apply to steamships until 1/1/2020.

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The other request is from US Shipping, who may have also reached out to Wayne. I copied a summary below of my call with them.

Is there a time, either today or sometime next week (I'm out of the office tomorrow), when you would be available for a call to discuss these requests?

Thanks,

Mike

Michael Samulski
U.S. Environmental Protection Agency
Office of Transportation and Air Quality

Director, Large Marine and Aircraft Center

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samulski.michael@epa.gov

I received a call from US Shipping Corp last Friday. This was the company that reached out to Kathy Metcalf (Chamber of Shipping of America) asking for an appropriate EPA contact.

US Shipping operates 6 Jones Act vessels in the Gulf and along the East Coast. They have 2 ships and 4 ATBs. One of the ships is a steamship named CHEMICAL PIONEER.

Ex. 4 CBI

Their specific request is an extension of the steamship exemption until sometime in 2021.

Ex. 4 CBI

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Contact details are below for the two people I spoke with:

Andy Hoeflin

Manager, Engineering

Office: (732) 635-2719

Cell: (732) 259-0943

Email: ahoefflin@usshipcorp.com <<mailto:ahoefflin@usshipcorp.com>>

Raymond Marquardt

Director, Safety Compliance

USS Vessel Management LLC

Tel: (732) 635-2708

Cell: (732) 259-0928

e-mail: rmarquardt@usshipcorp.com <<mailto:rmarquardt@usshipcorp.com>>

Message (Digitally Signed)

From: Rand, Michael P CIV [Michael.P.Rand@uscg.mil]
Sent: 6/2/2017 11:43:43 AM
To: Lundy, Wayne M CIV [Wayne.M.Lundy@uscg.mil]; Samulski, Michael [samulski.michael@epa.gov]
CC: Murad, Dale [Dale.Murad@uscg.mil]; Revelt, Jean-Marie [revelt.jean-marie@epa.gov]; Mueller, John [mueller.john@epa.gov]; Stout, Alan [stout.alan@epa.gov]; Aranda, Amber [aranda.amber@epa.gov]
Subject: RE: Two steamship exemption requests - time to talk?
Attachments: smime.p7s

Wayne:

Thanks for the feedback. After yesterday's announcement, I will be curious to see what they do next.

r/Mike

-----Original Message-----

From: Lundy, Wayne M CIV
 Sent: Friday, June 02, 2017 7:05 AM
 To: Samulski, Michael; Rand, Michael P CIV
 Cc: Edwards, Matt CAPT; Murad, Dale; Revelt, Jean-Marie; Mueller, John; Stout, Alan; Aranda, Amber
 Subject: RE: Two steamship exemption requests - time to talk?

Good morning,

After a day of phone-tag, I finally was able to talk w/ US Shipping Corp (Ray Marquardt & Andy Hoeflin-engineering manager) yesterday afternoon. They stated that they were seeking a waiver for the CHEMICAL PIONEER from the 2020 expiration of the Steamship exemption for some unspecified time in 2021.

Ex. 4 CBI

Ex. 4 CBI

I told them that if they want to pursue this, they will need to write a letter and send to both Coast Guard & EPA and both specifically & explicitly state what they are requesting.

That's where we left the conversation. Let me know if you have any questions.

v/r,
 Wayne

-----Original Message-----

From: Samulski, Michael [mailto:samulski.michael@epa.gov]
 Sent: Tuesday, May 30, 2017 10:17 AM
 To: Rand, Michael P CIV
 Cc: Edwards, Matt CAPT; Murad, Dale; Lundy, Wayne M CIV; Revelt, Jean-Marie; Mueller, John; Stout, Alan; Aranda, Amber
 Subject: [Non-DoD Source] RE: Two steamship exemption requests - time to talk?

Would tomorrow (Wed 5/31) from 1:00 to 2:00 work for USCG?

Thanks,

Mike

Michael Samulski
U.S. Environmental Protection Agency
Office of Transportation and Air Quality Director, Large Marine and Aircraft
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1 (734) 214-4532
samulski.michael@epa.gov

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Cc: Edwards, Matt CAPT <Matt.Edwards@uscg.mil>; Murad, Dale
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Subject: RE: Two steamship exemption requests - time to talk?

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U.S. Coast Guard Headquarters
Office of Commercial Vessel Compliance
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Cc: Samulski, Michael
Subject: RE: Two steamship exemption requests - time to talk?

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Sent: Thursday, May 25, 2017 8:01 AM
To: Lundy, Wayne M CIV; Rand, Michael P CIV; Edwards, Matt CAPT; Murad, Dale
Cc: Revelt, Jean-Marie; Aranda, Amber; Stout, Alan; Mueller, John
Subject: [Non-DoD Source] Two steamship exemption requests - time to talk?

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asking for an extension in the steamship exemption for ECA fuel sulfur standards. As a reminder, the ECA fuel sulfur standards do not apply to steamships until 1/1/2020.

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Michael Samulski

U.S. Environmental Protection Agency

Office of Transportation and Air Quality

Director, Large Marine and Aircraft Center

1 (734) 214-4532

samulski.michael@epa.gov

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Manager, Engineering

Office: (732) 635-2719

Cell: (732) 259-0943

Email: ahoefflin@usshipcorp.com <<mailto:ahoefflin@usshipcorp.com>>

Raymond Marquardt

Director, Safety Compliance

USS Vessel Management LLC

Tel: (732) 635-2708

Cell: (732) 259-0928

e-mail: rmarquardt@usshipcorp.com <<mailto:rmarquardt@usshipcorp.com>>

Message

From: Aranda, Amber [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2557889D5F134A3DBC525A2DBF6BFDF2-AARANDA]
Sent: 5/22/2017 3:23:52 PM
To: Samulski, Michael [samulski.michael@epa.gov]
Subject: RE: Question on the Steamship Extension

Ex. 5 Attorney Client (AC)

Amber L. Aranda
U.S. Environmental Protection Agency
Office of General Counsel
1200 Pennsylvania Avenue, NW
Washington, DC 20460
T: 202-564-1737
E: aranda.amber@epa.gov

From: Samulski, Michael
Sent: Monday, May 22, 2017 11:11 AM
To: Aranda, Amber <aranda.amber@epa.gov>
Subject: FW: Question on the Steamship Extension

Looping you in on the latest request...

Michael Samulski
U.S. Environmental Protection Agency
Office of Transportation and Air Quality
Director, Large Marine and Aircraft Center
1 (734) 214-4532
samulski.michael@epa.gov

From: Revelt, Jean-Marie
Sent: Monday, May 22, 2017 10:58 AM
To: Samulski, Michael <samulski.michael@epa.gov>
Cc: Stout, Alan <stout.alan@epa.gov>
Subject: RE: Question on the Steamship Extension

Mike,

Ex. 5 Deliberative Process (DP)

Jean Marie

Jean Marie Revelt, PhD

Office of Transportation and Air Quality
U.S. Environmental Protection Agency
2000 Traverwood
Ann Arbor MI 48105
tel: 734-214-4822
fax: 734-214-4816

From: Samulski, Michael
Sent: Friday, May 19, 2017 2:32 PM
To: Revelt, Jean-Marie <revelt.jean-marie@epa.gov>; Stout, Alan <stout.alan@epa.gov>
Subject: FW: Question on the Steamship Extension

I received a call from US Shipping Corp today. This was the company that reached out to Kathy Metcalf asking for an appropriate EPA contact.

US Shipping operates 6 Jones Act vessels in the Gulf and along the East Coast. They have 2 ships and 4 ATBs. One of the ships is a steamship named CHEMICAL PIONEER.

Ex. 4 CBI

Their specific request is an extension of the steamship exemption until sometime in 2021.

Ex. 4 CBI

Ex. 5 Deliberative Process (DP)

Mike

Michael Samulski
U.S. Environmental Protection Agency
Office of Transportation and Air Quality
Director, Large Marine and Aircraft Center
1 (734) 214-4532
samulski.michael@epa.gov

From: Ray Marquardt [<mailto:RMarquardt@usshipcorp.com>]
Sent: Friday, May 19, 2017 2:03 PM
To: Samulski, Michael <samulski.michael@epa.gov>
Cc: Andy Hoeflin <ahoeflin@usshipcorp.com>; Kathy Metcalf (kmetcalf@knowships.org) <kmetcalf@knowships.org>
Subject: Question on the Steamship Extension

Mike:

Thank you for taking the time this morning to discuss the CHEMCIAL PIONEER. I wanted to provide you our contact details:

Andy Hoeflin

Manager, Engineering

Office: (732) 635-2719

Cell: (732) 259-0943

Email: ahoefflin@usshipcorp.com

Please feel free to call if you have any additional questions. Thanks again for your assistance and we look forward to hearing from you.

Regards,

Ray

Raymond Marquardt

Director, Safety Compliance

USS Vessel Management LLC

Tel: (732) 635-2708

Cell: (732) 259-0928

e-mail: rmarquardt@usshipcorp.com

Message

From: Lantz, Jeffrey G SES [Jeffrey.G.Lantz@uscg.mil]
Sent: 2/8/2019 3:57:27 PM
To: Charmley, William [charmley.william@epa.gov]; Samulski, Michael [samulski.michael@epa.gov]
Subject: FW: [Non-DoD Source] Request for Meeting
Attachments: USS Steamship Exemption Position Paper 11-26-2018 Final Draft.pdf

Flag: Follow up

Bill and Mike –

My apologies for delay in advising you about this. Please see the attached, self-explanatory.

Right now, U.S. Shipping Corp (USS) has not made a formal request for an exemption. I, along with MARAD, have been asked to meet with them (separately). The request came in through Chamber of Shipping. The purpose of the mtg is to allow informal discussion.

I'm meeting with USS on the 20th.

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

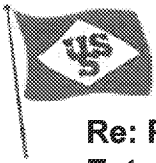
I'm meeting with MARAD on the 11th, it will be interesting to hear their view.

Also, while completely separate, this could easily be confused with the 2020 sulfur cap since the steamship exemption expires on the same date.

At this point, I don't see any need for EPA to do anything. Obviously, if this moves into the formal request stage, or Reg 3 proposal, etc, or political level....

Questions, please call or write.

R/



U.S. SHIPPING CORP

Re: Position Paper – CHEMICAL PIONEER (IMO # 6806444) Steamship Exemption Extension

U.S. Shipping Corp (USS) is seeking an extension for the CHEMICAL PIONEER to continue burning the higher sulfur fuel oil (HFO 3.5%) beyond the January 1, 2020 expiration date.

The CHEMICAL PIONEER is presently operating under the bunker Steamship Exemption which is scheduled to expire after December 31, 2019. USS is looking for an extension to operate in the U.S. ECA burning the higher sulfur fuel oil until 2025.

Ex. 4 CBI

Thank you for your consideration.

Message

From: Samulski, Michael [samulski.michael@epa.gov]
Sent: 12/9/2013 3:44:24 PM
To: Stout, Alan [stout.alan@epa.gov]; Revelt, Jean-Marie [revelt.jean-marie@epa.gov]; Mueller, John [mueller.john@epa.gov]
Subject: FW: Re: Viswa Lab EGCS Presentation

More on Viswa...

From: Timothy.M.Brown@uscg.mil [mailto:Timothy.M.Brown@uscg.mil]
Sent: Monday, December 09, 2013 10:42 AM
To: Samulski, Michael
Subject: RE: Re: Viswa Lab EGCS Presentation

Mike,

No slide deck, just a glossy hand-out that they use for trade shows. The operator is U.S. Shipping Corp (<http://www.usslp.com/fleet.php>). The vessels are U.S. flagged articulated tug/barge units, and possibly a small U.S. flagged product tanker from the same operator.

The initial conversation was very much feeling us out and trying to get a handle on the process to brief their client. Viswa Labs has apparently installed several land-based systems overseas, but no marine units and no land-based ones in the U.S.

Tim

From: samulski.michael@epa.gov [samulski.michael@epa.gov]
Sent: Monday, December 09, 2013 10:26 AM
To: Brown, Timothy M CIV
Subject: RE: Re: Viswa Lab EGCS Presentation

Tim,

Is there a presentation that goes along with this email exchange? Do we know what ship operator(s) they are working with?

Thanks,

Mike

Michael Samulski
U.S. Environmental Protection Agency
Office of Transportation and Air Quality
Director, Large Marine and Aircraft Center
1 (734) 214-4532
samulski.michael@epa.gov

From: Timothy.M.Brown@uscg.mil [mailto:Timothy.M.Brown@uscg.mil]
Sent: Monday, December 09, 2013 9:28 AM
To: Upi Kamal

Cc: Allain, Ryan D CDR; Samulski, Michael
Subject: RE: Re: Viswa Lab EGCS Presentation

Good Morning Upi,

I have copied Mr. Mike Samulski from EPA on this email so that he may also weigh-in with his agency's perspective.

If they were to apply for an exemption today, for a vessel that they intend to proceed with a scrubber instal, could a Reg 3 exemption be granted pending installation - so that they may start burning 3.5% HFO even before actual install. If the answer is YES, then besides the technical solution presentation, what else would the USCG like to see? - An actual contract?

The USCG and EPA have granted Reg 3 exemptions for a short period preceding the EGCS installation (several months) and for a testing and adjustment period following install, prior to the vessel requesting/recieving a Reg 4 equivalency for the EGCS. The conditions of each Reg 3 exemption are very case/vessel specific. The USCG and EPA seek to mitigate the impact of the exemption to the extent possible. Depending on fuel availability and past sulfur fuel content for that vessel the exemption may be to a lower sulfur content (between the 3.5% worldwide cap and 1.0% ECA cap). Low sulfur fuel use/cold-ironing/shore power use at berth, and other mitigating activities could be included as a condition of the permit.

USCG and EPA do not necessarily need to see a contract, but sufficient proof of the ship owner's commitment to the project and of the maturity of the design/contracting process would be required.

Best,
 Tim

From: upik@viswalab.com [upik@viswalab.com]
Sent: Saturday, December 07, 2013 10:32 AM
To: Brown, Timothy M CIV
Subject: Fwd: Re: Viswa Lab EGCS Presentation

Hello Tim

Wondering if you got this? May I kindly request you to browse this below for accuracy. Thanks so much for your time.

Best Regards

Upi

----- Original Message -----

From: Upi Kamal <upik@viswalab.com>
 To: "Brown, Timothy M CIV" <Timothy.M.Brown@uscg.mil>
 Date: November 17, 2013 at 2:17 PM
 Subject: Re: Viswa Lab EGCS Presentation

Hello Tim

I have tried to capture the points you made in our meeting hereunder. May I kindly ask you to see, if I am being accurate. Please feel free to mark it up as necessary. This will help us greatly. One question that the ship owner does have is:

If they were to apply for an exemption today, for a vessel that they intend to proceed with a scrubber instal, could a Reg 3 exemption be granted pending installation - so that they may start burning 3.5% HFO even before actual install. If the answer is YES, then besides the technical solution presentation, what else would the USCG like to see? - An actual contract?

Thanks so much Tim, you have been so helpful

Best Regards

Upi

MEETING NOTES

1. Getting the waiver is an interactive process that involves all four parties. The ship owner + The Vendor + The USCG + The US EPA. Since USCG and EPA are also new to the process, there is no standard form for approval. It is largely an interactive process, in which the the Govt. entities will determine the seriousness of the ship owner to go through the process of install and commissioning and the vendor has to present the technical solution that provides the Govt. with enough confidence that the scrubber install will indeed result in SOx levels obtainable by MGO.
2. There is a precedence - a waiver has been granted to US Flagged Cruise Vessel belonging to NCL
3. The process can start right away. Next step would be for the vendor to make a technical proposal and present the solution formally in writing, followed by a presentation about our solution, showing pedigree and all technical aspects of water balance, flows, weights etc.. This has to be done to the USCG as well as the EPA. I have been provided with contact details of the person in charge at EPA, he is based in Ann Arbor MI. It is desirable for the ship owner to be present at these presentations.
4. If we get a "warm and fuzzy" from these Govt. entities, the ship owner and vendor can proceed to the contractual phase and develop a time line, which will be presented by formal letter to the Govt. , including name of vessel/vessels. More than 1 vessel can be covered at one time.
5. The Govt. authorities then based upon the technical aspects and their belief in it and upon the timeline, will work to provide a Reg 3 exemption. After installation and commissioning is complete and if the performance yields the required SOx reduction, the exemption will graduate to a Reg 4 waiver.
6. Waiver is valid for a period of 5 years and will be renewed upon renewal of the IAPP certificate.
7. At some point the Class will also be brought into the loop on an informational basis.

Specific Questions:

- What determines compliance
 - Actual readings from stack, once installed and in service
- Stack testing or installation of an Approved system
 - There is no approved system, perse.
- When does it start. -
 - Reg 3 exemption process can start right away, if Ship Owner has decided to go down this path. Exemption will come into force when system is commissioned.

On November 16, 2013 at 4:49 PM Upi Kamal <upik@viswalab.com> wrote:

Hi Tim

Thanks for the follow up and mostly thanks for your time, which I found most informative. Look forward to working closely with you and Mr. Samulski.

My Best Regards

Upi

> On November 14, 2013 at 2:56 PM "Brown, Timothy M CIV"

<Timothy.M.Brown@uscg.mil> wrote:

>

>

> Hello Upi,

>

> Thanks for your time yesterday. As promised I am cc'ing Mr. Mike Samulski of the EPA on this email. His contact information is below:

>

> *****

>

> Michael Samulski

>

> U.S. Environmental Protection Agency

>

> Office of Transportation and Air Quality

>

> Director, Large Marine and Aircraft Center

>

> 1 (734) 214-4532

>

> samulski.michael@epa.gov

>

> *****

>

> The USCG and EPA work together to consider and approve any equivalencies or exemptions issued for U.S. flagged ships under MARPOL Annex VI. We are interested in reviewing anything you or your clients may be able to provide regarding your proposal.

>

> Best,

> Tim

>

> Tim Brown

> U.S. Coast Guard Headquarters

> Environmental Standards Division (CG-OES-3)

> Phone: 202.372.2358 | Fax: 202.372.1928

>

>

Message (Digitally Signed)

From: Rand, Michael P CIV [Michael.P.Rand@uscg.mil]
Sent: 6/2/2017 11:43:43 AM
To: Lundy, Wayne M CIV [Wayne.M.Lundy@uscg.mil]; Samulski, Michael [samulski.michael@epa.gov]
CC: Murad, Dale [Dale.Murad@uscg.mil]; Revelt, Jean-Marie [revelt.jean-marie@epa.gov]; Mueller, John [mueller.john@epa.gov]; Stout, Alan [stout.alan@epa.gov]; Aranda, Amber [aranda.amber@epa.gov]
Subject: RE: Two steamship exemption requests - time to talk? US Shipping Corp.
Attachments: smime.p7s

Wayne:

Thanks for the feedback. After yesterday's announcement, I will be curious to see what they do next.

r/Mike

-----Original Message-----

From: Lundy, Wayne M CIV
Sent: Friday, June 02, 2017 7:05 AM
To: Samulski, Michael; Rand, Michael P CIV
Cc: Edwards, Matt CAPT; Murad, Dale; Revelt, Jean-Marie; Mueller, John; Stout, Alan; Aranda, Amber
Subject: RE: Two steamship exemption requests - time to talk?

Good morning,

After a day of phone-tag, I finally was able to talk w/ US Shipping Corp (Ray Marquardt & Andy Hoeflin-engineering manager) yesterday afternoon. They stated that they were seeking a waiver for the CHEMICAL PIONEER from the 2020 expiration of the Steamship exemption for some unspecified time in 2021.

Ex. 4 CBI

Ex. 4 CBI

Ex. 4 CBI

I told them that if they want to pursue this, they will need to write a letter and send to both Coast Guard & EPA and both specifically & explicitly state what they are requesting.

That's where we left the conversation. Let me know if you have any questions.

v/r,
Wayne

-----Original Message-----

From: Samulski, Michael [mailto:samulski.michael@epa.gov]
Sent: Tuesday, May 30, 2017 10:17 AM
To: Rand, Michael P CIV
Cc: Edwards, Matt CAPT; Murad, Dale; Lundy, Wayne M CIV; Revelt, Jean-Marie; Mueller, John; Stout, Alan; Aranda, Amber
Subject: [Non-DoD Source] RE: Two steamship exemption requests - time to talk?

Would tomorrow (Wed 5/31) from 1:00 to 2:00 work for USCG?

Thanks,

Mike

Michael Samulski
U.S. Environmental Protection Agency
Office of Transportation and Air Quality Director, Large Marine and Aircraft
Center
1 (734) 214-4532
samulski.michael@epa.gov

-----Original Message-----

From: Rand, Michael P CIV [mailto:Michael.P.Rand@uscg.mil]
Sent: Tuesday, May 30, 2017 9:42 AM
To: Samulski, Michael <samulski.michael@epa.gov>
Cc: Edwards, Matt CAPT <Matt.Edwards@uscg.mil>; Murad, Dale
<Dale.Murad@uscg.mil>; Lundy, Wayne M CIV <Wayne.M.Lundy@uscg.mil>
Subject: RE: Two steamship exemption requests - time to talk?

Mike:

I apologize for the delay in responding. I was on leave most of last week.

I am available most of this week to discuss this. I have a meeting tomorrow morning from 9 - 11, and one Thursday from 1:00 until 2:30, but those are the only times I will be unavailable.

Pick a time that is good for you and let me know.

Ex. 4 CBI

r/Mike

-----Original Message-----

From: Edwards, Matt CAPT
Sent: Thursday, May 25, 2017 9:06 AM
To: Murad, Dale; Lundy, Wayne M CIV; Rand, Michael P CIV
Cc: Samulski, Michael
Subject: RE: Two steamship exemption requests - time to talk?

I believe Mike Rand is out the remainder of the week. I would prefer to wait until he returns if we can.

CAPT Matt Edwards, P.E.
U.S. Coast Guard Headquarters
Office of Commercial Vessel Compliance
(202) 372-1210

-----Original Message-----

From: Murad, Dale
Sent: Thursday, May 25, 2017 8:43 AM
To: Lundy, Wayne M CIV; Rand, Michael P CIV; Edwards, Matt CAPT
Cc: Samulski, Michael
Subject: RE: Two steamship exemption requests - time to talk?

Wayne, Mike, Capt Edwards--I'm in today. As of now I'm in all next week, but that may change. (If you do it next week and I'm not in, I'll either call in or have someone cover for me.) Dale

-----Original Message-----

From: Samulski, Michael [mailto:samulski.michael@epa.gov]
Sent: Thursday, May 25, 2017 8:01 AM
To: Lundy, Wayne M CIV; Rand, Michael P CIV; Edwards, Matt CAPT; Murad, Dale
Cc: Revelt, Jean-Marie; Aranda, Amber; Stout, Alan; Mueller, John
Subject: [Non-DoD Source] Two steamship exemption requests - time to talk?

Over the past week or so, we've had two Jones Act companies approach us

asking for an extension in the steamship exemption for ECA fuel sulfur standards. As a reminder, the ECA fuel sulfur standards do not apply to steamships until 1/1/2020.

Ex. 4 CBI

The other request is from US Shipping, who may have also reached out to Wayne. I copied a summary below of my call with them.

Is there a time, either today or sometime next week (I'm out of the office tomorrow), when you would be available for a call to discuss these requests?

Thanks,

Mike

Michael Samulski

U.S. Environmental Protection Agency

Office of Transportation and Air Quality

Director, Large Marine and Aircraft Center

1 (734) 214-4532

samulski.michael@epa.gov

I received a call from US Shipping Corp last Friday. This was the company that reached out to Kathy Metcalf (Chamber of Shipping of America) asking for an appropriate EPA contact.

US Shipping operates 6 Jones Act vessels in the Gulf and along the East Coast. They have 2 ships and 4 ATBs. One of the ships is a steamship named CHEMICAL PIONEER.

Ex. 4 CBI

Their specific request is an extension of the steamship exemption until sometime in 2021.

Ex. 4 CBI

Contact details are below for the two people I spoke with:

Andy Hoeflin

Manager, Engineering

Office: (732) 635-2719

Cell: (732) 259-0943

Email: ahoefflin@usshipcorp.com <<mailto:ahoefflin@usshipcorp.com>>

Raymond Marquardt

Director, Safety Compliance

USS Vessel Management LLC

Tel: (732) 635-2708

Cell: (732) 259-0928

e-mail: rmarquardt@usshipcorp.com <<mailto:rmarquardt@usshipcorp.com>>

Message

From: Samulski, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7ECF1AF23A134D2995FD354D03632D6C-SAMULSKI, MICHAEL]
Sent: 9/4/2014 1:44:06 PM
To: Jeff Miller [jmill@usshipcorp.com]
Subject: RE: Question From US Shipping Corporation

Dear Jeff,

There is a provision that allows for an exemption from specific provisions (such as the ECA fuel sulfur standards) for a ship to conduct trials for the development of ship emission reduction emission reduction and control technologies, where the standards could impede research into the development of such technologies.

SOx scrubber development programs have been established under this provision for Carnival and Norwegian. These are not cookie-cutter programs, but are established on a case-by-case basis.

I would be glad to discuss this further with you. My contact information is below.

Best regards,

Mike

 Michael Samulski
 U.S. Environmental Protection Agency
 Office of Transportation and Air Quality
 Director, Large Marine and Aircraft Center
 1 (734) 214-4532
 samulski.michael@epa.gov

From: Jeff Miller [mailto:jmill@usshipcorp.com]
Sent: Wednesday, September 03, 2014 6:03 PM
To: Samulski, Michael
Subject: Question From US Shipping Corporation

Dear Michael,

My name is Jeff Miller and I work for US Shipping Corporation in Edison, New Jersey. **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP) About a year ago a company came to me and said that if we bought a Scrubber for one of our vessel's and installed it in the next shipyard that there were EPA waiver's available so we would not have to comply with the new fuel regulations until the vessel came out of the shipyard with the installed scrubber. We have heard about Carnival Cruise lines waiver but not the details. I have subsequently been reading a few Articles on the subject and I'm still confused. I read one about emissions averaging by Norwegian Cruise lines. If possible could you give me some advice on waivers, if they are available, and if so what we would need to do to obtain one?

Thanks and Rgds,
 Jeffrey Miller
 Vice President
 US Shipping Corp.

Message (Digitally Signed)

From: Lundy, Wayne M CIV [Wayne.M.Lundy@uscg.mil]
Sent: 9/20/2018 11:21:07 AM
To: Samulski, Michael [samulski.michael@epa.gov]
Subject: FW: [Non-DoD Source] 2020 North America ECA question
Attachments: smime.p7s

Hi Mike,

Please see Dave's email below. I am not aware of the granting of any exemption. Are you?

Thanks,
Wayne

From: David St. Amand <DaveSt@navigistics.com>
Sent: Tuesday, September 18, 2018 3:28 PM
To: Lundy, Wayne M CIV <Wayne.M.Lundy@uscg.mil>
Subject: [Non-DoD Source] 2020 North America ECA question

Wayne,

Greetings. I'm assuming that I will see you at MEPC 73 in the not too distant future.

Quick question on the North America ECA (you are wondering why I have 2020 in the subject line I bet), the EPA and USCG gave steam powered ships an exemption (probably calling it something else) from the 0.1% sulfur requirement until 1/1/2020 (ahh, you say now I understand the 2020). There are rumors around the Jones Act trade (I write a report covering the Jones Act - my main business line - IMO 2020 is a distant second) that U.S. Shipping's *Chemical Pioneer* (a really old steam powered chemical tanker) requested an extension of two years past the 1/1/2020 deadline. My best source says that the extension request was denied (which makes sense to me) but other reliable sources says that it was granted. Do you know the answer? Can you share it? If not, can you refer me to someone else?

Thanks, see you in London.

Regards,

Dave St. Amand
Navigistics Consulting
1740 Massachusetts Avenue
Boxborough, MA 01719
978-266-1882
navigistic@aol.com
DaveST@navigistics.com
SKYPE: davidstamand
www.Navigistics.com

Message

From: Samulski, Michael [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7ECF1AF23A134D2995FD354D03632D6C-SAMULSKI, MICHAEL]
Sent: 9/25/2018 4:59:02 PM
To: Lundy, Wayne M CIV [Wayne.M.Lundy@uscg.mil]
Subject: RE: [Non-DoD Source] 2020 North America ECA question

No. Last I heard, USCG had determined **Ex. 5 Deliberative Process (DP)** and I'm not aware of this ever happening.

I will forward you the most recent email I have on this. It was from 8/1/17, and you were included on the chain. Do you know if USCG ever sent a response to US Shipping?

Mike

Michael Samulski
 U.S. Environmental Protection Agency
 Office of Transportation and Air Quality
 Director, Large Marine and Aviation Center
 1 (734) 214-4532
 samulski.michael@epa.gov

From: Lundy, Wayne M CIV [mailto:Wayne.M.Lundy@uscg.mil]
Sent: Thursday, September 20, 2018 7:21 AM
To: Samulski, Michael <samulski.michael@epa.gov>
Subject: FW: [Non-DoD Source] 2020 North America ECA question

Hi Mike,

Please see Dave's email below. I am not aware of the granting of any exemption. Are you?

Thanks,
 Wayne

From: David St. Amand <DaveSt@navigistics.com>
Sent: Tuesday, September 18, 2018 3:28 PM
To: Lundy, Wayne M CIV <Wayne.M.Lundy@uscg.mil>
Subject: [Non-DoD Source] 2020 North America ECA question

Wayne,

Greetings. I'm assuming that I will see you at MEPC 73 in the not too distant future.

Quick question on the North America ECA (you are wondering why I have 2020 in the subject line I bet), the EPA and USCG gave steam powered ships an exemption (probably calling it something else) from the 0.1% sulfur requirement until 1/1/2020 (ahh, you say now I understand the 2020). There are rumors around the Jones Act trade (I write a report covering the Jones Act - my main business line - IMO 2020 is a distant second) that U.S. Shipping's *Chemical Pioneer* (a really old steam powered chemical tanker) requested an extension of two years past the 1/1/2020 deadline. My best source says that the extension request was denied (which makes sense

to me) but other reliable sources says that it was granted. Do you know the answer? Can you share it? If not, can you refer me to someone else?

Thanks, see you in London.

Regards,

Dave St. Amand
Navigistics Consulting
1740 Massachusetts Avenue
Boxborough, MA 01719
978-266-1882
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SKYPE: davidstamand
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